

EXHIBIT H

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

KIMBERLY WROBLEWSKI,

Plaintiff,

v.

CASE NUMBER: 24-cv-10011
HON: MARK A. GOLDSMITH

CITY OF DETROIT, COUNTY OF WAYNE,
JAMES DIGUISEPPE, NICHOLAS GIAQUINTO,
BRIAN RINEHART, and DENNIS DOHERTY,
in their individual and official capacities,

Defendants.

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SHAWN C. CABOT (P64021)
KRYSTINA R. DOSS (P77365)
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PLAINTIFF'S SECOND REQUEST FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT BRIAN RINEHART

NOW COMES Plaintiff, by and through her attorneys, CHRISTOPHER TRAINOR & ASSOCIATES, who submits the following Request for Production of Documents to all Defendants.

This Request for Production of Documents is submitted pursuant to the Federal Rules of Civil Procedure. The information and documents sought must be given under oath, whether it is secured by you, your agent, representative, attorney or any other person who has made this knowledge known to you, from whom you can get this information and documents or who is competent to provide the information and documents you are requested to produce; the information and documents must be served upon the undersigned Plaintiff's attorney, CHRISTOPHER TRAINOR & ASSOCIATES, within thirty (30) days from the date this Request For Production of Documents is served upon you.

This Request for Production of Documents shall be deemed continuing and supplemental; documents and/or information shall be required immediately upon receipt thereof if the said parties directed to produce them directly or indirectly obtains further or different information and/or documents from the time the information and documents are served to the time of trial in this matter. If the items requested no longer exist or they never existed please notate the same.

REQUEST FOR PRODUCTION OF DOCUMENTS INSTRUCTIONS

1. "Document" means any handwritten, typewritten, recorded, or graphic matter however produced or reproduced, whether or not in the possession custody or control of the defendants, and whether or not claimed to be privileged against discovery or any ground, including but not limited to: all contracts, reports, books, records, lists, memoranda, correspondence, telegrams, telexes, appointment calendars, diaries, schedules, films, videos, photographs, sound recordings, signed or unsigned documents, any and all prison/jail records, as well as sent or unsent drafts of documents. "Document" shall also mean and include the original and every copy regardless of origin or location.
2. "Identify" when used in reference to an individual means to state that person's full name, present address, present or last known position and business affiliation.
3. When used in reference to persons or members of a class, the term, "identify" means to identify each individual member or members of such class.
4. "Identify", "identification", or "describe" when used in reference to documents means to state the following as to each such document: (a) the title, if any, and the nature and contents thereof; (b) the date; (c) the date the document was executed if different from the date it bears; (d) the name, address, and position of the addressee, if any; (e) the present location and the name, present address, and position of the person having present custody; and (g) whether the document has been destroyed, and if so,

with regard to such destruction, the date, the reason and the identity of the person or persons who destroyed the document.

5. The above information shall be given in sufficient detail to enable a party or person to whom a subpoena or Request for Production is directed to fully identify the documents sought to be produced and to enable counsel for the Plaintiff to determine that such document, when produced, is, in fact, the document so described.

6. When used in these Interrogatories, the terms "you" and "your(s)" includes the Defendant as well as the Defendant's agents, servants, employees, partners, representatives, experts and consultants, and unless privileged, the attorneys.

7. "Date" means the exact date, month and year, if ascertainable, if not, your best approximation, which may include relationships to other events.

8. If any information is withheld under a claim of privilege or other exclusion from discovery, state the nature of the information or document withheld, the privilege or other exclusion that is claimed, and the facts upon which the claim of privilege or exclusion is based.

9. The singulars shall be deemed to include the plural and vice-versa and the words "and" and "or" shall be construed either conjunctively or disjunctively, in the manner which affords the broadest scope to the Interrogatories.

10. Do not respond to any interrogatory merely by stating, "see attached." Specifically identify the particular documents that are responsive to each Interrogatory.

11. For the convenience of the Court and the parties, please restate each Interrogatory to your written response prior to your written identification of the produced documents.

12. The word, "person" means any natural person, firm or corporation, partnership, joint venture, or any other form of business entity.

REQUEST FOR PRODUCTION OF DOCUMENTS

Please produce the following:

1. Any and all letters, correspondence, and/or documents relating to any investigations undertaken regarding Plaintiff and the incidents complained of.

RESPONSE:

2. Any and all files, records, letters, correspondence, documents, and things in any way relating to disciplines issued and/or disciplinary action taken against you regarding Plaintiff and the incidents complained of.

RESPONSE:

3. Any and all Garrity documents you possess regarding Plaintiff and the incidents complained of.

RESPONSE:

4. Any and all text messages sent by you or received by you from anyone which in any way relates to the incidents complained of.

RESPONSE:

5. Any and all Internal Affairs documents and things in your possession which in any way relate to Plaintiff and the incidents complained of.

RESPONSE:

6. Any and all email exchanges between yourself and any other named Defendant in this case which relates to the incidents complained of.

RESPONSE:

7. Any and all email exchanges between yourself and any other person or entity which in any way relates to the incidents complained of.

RESPONSE:

8. Any and all documents in your possession which relate to the investigation, arrest, and prosecution of Plaintiff.

RESPONSE:

9. Any and all documents related to any ethics investigations related to the incidents complained of.

RESPONSE:

10. Any and all documents relating to any sort of investigations undertaken by anyone or any agency regarding the incidents complained of.

RESPONSE:

11. Any and all photographs you possess which in any way relate to the incidents complained of.

RESPONSE:

These Requests for Production of Documents are deemed continuing up to and through the time of trial.

Names, titles, and signatures of persons answering these Interrogatories.

Respectfully Submitted,
CHRISTOPHER TRAINOR & ASSOCIATES

BY: 

~~CHRISTOPHER J. TRAINOR (P42449)~~

~~SHAWN C. CABOT (P64021)~~

~~KRYSTINA R. DOSS (P77365)~~

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Dated: May 23, 2024

PROOF OF SERVICE

The undersigned certified that on the 24 day of May, 2024, a copy of the foregoing document was served upon the attorney (s) of record by e-mailing a copy of same to said attorney (s) at their stated business e-mail addresses. I declare under the penalty of perjury that the foregoing statement is true to the best of my information, knowledge and belief.



Courtney Frederick